

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

	)	
	)	
GRAND ISLE GAMES, LLC,	)	Case No.: 3:25-cv-00390
	)	
Plaintiff,	)	
	)	
v.	)	Judge: Aleta A. Trauger
	)	
	)	Magistrate Judge:
THE ENTITIES, PARTNERSHIPS, AND	)	
UNINCORPORATED ASSOCIATIONS	)	
LISTED ON SCHEDULE A,	)	<b>JURY DEMAND</b>
	)	
Defendants.		

**PLAINTIFF’S PROPOSED NOTICE LANGUAGE AND NOTIFICATION PLAN  
REGARDING CONSEQUENCES OF DEFAULT**

Plaintiff, GRAND ISLE GAMES, LLC (“Plaintiff”), by and through its undersigned counsel, hereby files this Proposed Notice Language and Notification Plan Regarding Consequences of Default, pursuant to the Court’s instruction at the May 29, 2025 preliminary injunction hearing.

Plaintiff will provide email notice to all served defendants, at the same email addresses by which email service was accomplished on the defendants listed in Exhibit 1 to the Powell PI Declaration, including the following body text:

You have been identified as a potentially infringing party in *Grand Isle Games, LLC v. The Entities, Partnerships, and Unincorporated Associations Listed on Schedule A*, No. 3:25-cv-00390 (M.D. Tenn.). For that reason, your assets located in the United States have been frozen by an Order of the United States District Court for the Middle District of Tennessee (Dk. 52). You are hereby put on notice that if you do not settle with the Plaintiff, or enter an appearance in this case and file a response to the Complaint, within 21 days of the date on which you were served with the Complaint, Plaintiff will move the Court for entry of an Order of Default and for entry of a Default Judgment against you, which could result in forfeiture of some or all of your frozen assets to the Plaintiff.

The above notice text will also be added to the website used for notice by publication in this case, [www.waddeyacheson.com/notice](http://www.waddeyacheson.com/notice). Today, Plaintiff will update the notice site and provide the above email notice to all defendants whom it has been able to serve.

Dated: June 2, 2025

Respectfully submitted,

*/s/ G. Edward Powell III*

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Chanelle Acheson (TN BPR #30008)  
W. David Bridgers (TN BPR #16603)  
G. Edward Powell III (CA Bar #324530)  
**Waddey Acheson LLC**  
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Nashville, TN 37212  
615-839-1100  
ed@waddeyacheson.com  
Counsel for Plaintiff Grand Isle Games, LLC

## CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2025, a true and correct copy of the foregoing PLAINTIFF'S PROPOSED NOTICE LANGUAGE AND NOTIFICATION PLAN REGARDING CONSEQUENCES OF DEFAULT will be served upon the Defendants listed in Schedule A to the Complaint via the alternative methods of service previously authorized by this Court's Order dated April 22, 2025, including service by electronic mail to the email addresses identified for each Defendant and/or by publication, as set forth in said Order.

/s/ G. Edward Powell III\_\_\_\_\_

Chanelle Acheson (TN BPR #30008)  
W. David Bridgers (TN BPR #16603)  
G. Edward Powell III (CA Bar #324530)  
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